

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

FILED
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SUSAN MURRAY,

Plaintiff

vs.

THE CITY OF AUSTIN, and
CHANNY SOEUR,

Defendants

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CAUSE NO. A-02-CA-784SS

DEFENDANT CHANNY SOEUR'S PRETRIAL DISCLOSURES

TO: Susan Murray, Plaintiff, by and through her attorneys of record, Susan Cone Kilgore, P. O. Box 535, Houston, Texas 77001 and Mark Aronowitz, Of Counsel, McFatridge, Baker & Deen, P.C., 3900 Essen Lane, Suite 730, Houston, Texas 77027

City of Austin, Defendant, by and through its attorney of record, Robin Sanders, Assistant City Attorney, City of Austin, P. O. Box 1546, Austin, Texas 78767-1546

Defendant, Channy Soeur ("Soeur) makes these pretrial designations pursuant to Fed. R. Civ. P. 26(a)(3) and the Court's Scheduling Order.

Potential Witnesses

1. The following are witnesses that Soeur expects to call at trial:

a. Channy Soeur
CAS Consulting & Services, Inc.
401 E. Grady Drive, Unit A
Austin, Texas 78753
(512) 836-2388

b. Juan Garza
General Manager
Austin Energy Department
721 Barton Springs Road
Austin, Texas 78704
(512) 494-9400

- c. Ricardo Ramirez
Administrative & Finance Manager
Management Services Division
City of Austin Parks and Recreation Department
200 South Lamar Blvd.
Austin, Texas 78704
(512) 974-6700
- d. Candy Moreno
Municipal Programs Professional
City of Austin Parks and Recreation Department
200 South Lamar Blvd.
Austin, Texas 78704
(512) 974-6700
- e. Toni Grasso
Administrative Specialist
PARD Forestry Division
City of Austin Parks and Recreation Department
200 South Lamar Blvd.
Austin, Texas 78704
(512) 974-6700
- f. Chuck Webb
Municipal Programs Paraprofessional
City of Austin Parks and Recreation Department
200 South Lamar Blvd.
Austin, Texas 78704
(512) 974-6700
- g. Judy Buonaguidi
Lower Colorado River Authority
Water Resource Protective
3700 Lake Austin Boulevard
Austin, Texas 78703
(512) 473-3200 Ext. 2324
- h. Jan Fulkerson
Former employee
City of Austin Parks and Recreation Department
200 South Lamar Blvd.
Austin, Texas 78704
(512) 974-6700

- i. Tameka Dove
Dispatcher
City of Austin Parks and Recreation Department
200 South Lamar Blvd.
Austin, Texas 78704
(512) 974-6700
- j. Jay Culver
Forester Specialist
City of Austin Parks and Recreation Department
200 South Lamar Blvd.
Austin, Texas 78704
(512) 974-6700
- l. Susan Murray
c/o Susan Cone Kilgore
P. O. Box 535
Houston, Texas 77001
(713) 796-2608
- m. Jesus M. Olivares
Director
Parks and Recreation Department
City of Austin
P. O. Box 1088
Austin, Texas 78767
(512) 974-6717
- n. Dina Haines
City of Austin
P. O. Box 1088
Austin, Texas 78767
(512) 974-2000
- o. Kurt Tatum
Address Unknown

- p. Carol Guthrie
AFSCME
815 Brazos, Suite 500
Austin, Texas 78701
(512) 477-9181
- q. Willie Rhoades
City of Austin
P. O. Box 1088
Austin, Texas 78767
(512) 974-2000
- r. Warren Struss
Manager – Operations Division
Parks and Recreation Department
City of Austin
P. O. Box 1088
Austin, Texas 78767
(512) 974-2000
- s. Marianne Ramirez
Human Resources Supervisor – Management Services
Parks and Recreation Department
City of Austin
P. O. Box 1088
Austin, Texas 78767
(512) 974-2000

2. The following are witnesses that Soeur may call if the need arises:

Testifying Experts

Soeur has no Testifying Experts.

Proposed Exhibits

3. The following is a list of the exhibits that Soeur expects to offer:

EXHIBIT NO.	BATES NO.	DATE	DESCRIPTION
1	CS 000171-172	Undated	Channy Soeur's Job Description at PARD
2	CS 000173-177	Undated	Resume of Channy Soeur
3	COA 0133	Undated	Forestry Division Organizational Chart
4	COA 000170	Undated	Forestry Division Organizational Chart
5	CS 000141	Undated	Page 233 – Channy Soeur's PARD III Daily Notes
6	CS 000142	Undated	Page 234 – Channy Soeur's PARD III Daily Notes
7	CS 000144-148	04/27/99	Certificate of Incorporation of CAS Consulting and Services, Inc. and Articles of Incorporation
8	CS 000150	06/24/99	Fax Cover Sheet from Bank of America to Channy Soeur re: business accounts
9	CS 000149	(1)05/25/99 (2) 06/09/99	(1) Check No. 7928 from Channy or Laura Soeur to CAS Consulting & Services in the amount of \$500.00 and (2) Check No. 2735 from C. T. Chang or George Chang to CAS Consulting and Services in the amount of \$460.00

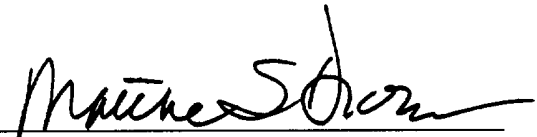
10	CS 000151	(1) 06/29/99 (2) Illegible	(1) Check No. 7844 from Channy or Laura Soeur to CAS Consulting & Services in the amount of \$500.00 and (2) Money Order from Cecilia Grattias to CAS Consulting & Services (amount illegible)
11	CS 000152	07/01/99	Bank of America Bank Statement of CAS Consulting and Services - Account No. 0047 7053 2765
12	CS 000153	(1) 07/07/99 (2) 07/10/99	(1) Check No. 0992 from CAS Consulting and Services to Constancio Concrete in the amount of \$7,650.00 and (2) Check No. 1001 from CAS Consulting and Services to Wholesale Distributor Outlet in the amount of \$185.00
13	CS 000143	01/02/00	Page 245 of Channy Soeur's PARD III Daily notes
14	CS 000154	01/03/00	CAS Consulting and Services Annual Meeting Minutes of Board of Directors
15	CS 000024-25	01/25/00	Summary of Meeting of Urban Forestry Board
16	CS 000156	06/28/00	Certificate from Austin Community College to Channy Soeur on completion of requirements on AutoCAD 2000 Advanced
17	CS 000157	07/01/00	Texas Sales and Use Tax Permit for CAS Consulting and Services
18	CS 000155	07/05/00	Minutes of Special Meeting of Board of CAS Consulting and Services
19		07/18/00	COA Personnel Action – Murray New Hire
20	CS 000158	08/16/00	Certificate from Austin Community Collage to Channy Soeur on completion of requirements for Introduction to ArcView GIS
21	CS 000139-140	08/31/00	Pages 157 and 159 Channy Soeur's PARD III Daily Notes
22	CS 000138	09/25/00	Page from Channy Soeur's 2000 Calendar

23		12/03/00	Transcript of Susan Murray Tape of Soeur telephone calls
24	CS 000159	01/02/01	Minutes of Annual Meeting of CAS Consulting and Services Board of Directors
25	CS 000160-163	01/02/01	Stock Certificates and Stock Transfer Ledges for stock issues to Channy Soeur and George Chi-Tong Chang
26	CS 000137	01/08/01	Page from Channy Soeur's 2001 Calendar
27	CS 000023	02/13/01	E-mail from Toni Grasso to Channy Soeur re: attachment of 01/01 board minutes
28	CS 00008	02/21/01	E-mail from Susan Murray to Channy Soeur re: WF Board Mtg-Feb.
29	SMM13	02/28/02	E-mail from Susan Murray to Toni Grasso re: Urban Forestry Board Minutes
30	CS 000315	03/06/01	Memo from Susan Murray to Rick Ramirez re: Response to Judy Buonoguidi Unemployment Filing
31	CS 000312	03/09/01	Certificate of Registration of CAS Consulting and Services, Inc. from Texas Board of Professional Engineers
32	CS 000164	03/13/01	Letter from Victoria Hsu of Texas Board of Professional Engineers to CAS Consulting and Services re: firm has been registered with Texas Board of Professional Engineers
33	CS 000166	03/19/01	Channy Soeur's Letter of Resignation
34	CS 000165	03/31/01	Minutes of Special Meeting of CAS Consulting and Services Board of Directors
35		12/05/01	COA Personnel Action – Susan Murray re: change fund agency
36	COA 0191	02/07/02	E-mail from Don Koehler to Edward Mokarzel re: Susan Murray's safety concerns

37		07/03/02	COA Personnel Action - Susan Murray re: transfer to Director's Office w/Willy Conrad's group
38	CS 000320-325	2000-2001	COA PARD SSPR for Urban Forestry

Respectfully submitted,

MINTON, BURTON, FOSTER & COLLINS
A Professional Corporation
1100 Guadalupe Street
Austin, Texas 78701
Telephone: (512) 476-4474
Facsimile: (512) 476-1315

By: 

Charles R. Burton
State Bar No. 03476000
Martha Dickie
State Bar No. 05833100

ATTORNEYS FOR CHANNY SOEUR

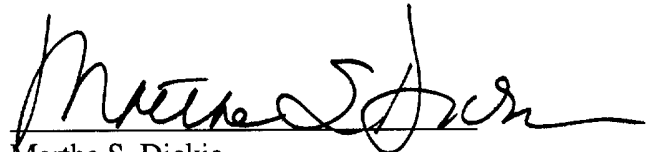
CERTIFICATE OF SERVICE

On this the 10th day of November, 2003, a true and correct copy of the above and foregoing Defendant Channy Soeur's Pretrial Designations was forwarded via United States Mail, Certified, Return Receipt Requested to the following:

Susan Cone Kilgore
P. O. Box 535
Houston, Texas 77001

Mark Aronowitz
McFatrige, Baker & Deen, P.C.
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P. O. Box 1546
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Martha S. Dickie